

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Iva Bonelli  <u>Debtor(s)</u>  vs.  Nationstar Mortgage LLC d/b/a Mr. Cooper <u>Respondent</u>  and  KML Law Group, P.C. <u>Respondent</u>  William C. Miller Esq. <u>Trustee</u>	CHAPTER 13  NO. 20-14471 ELF
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**STIPULATION RESOLVING DEBTOR'S MOTION FOR CONTEMPT FOR  
VIOLATION OF THE AUTOMATIC STAY AND FOR LIMITED STAY RELIEF**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. On September 16, 2021, Debtor filed a Motion for Contempt for Violation of the Automatic Stay against Respondents, Nationstar Mortgage LLC d/b/a Mr. Cooper and KML Law Group, P.C. (hereinafter referred to as "Respondents").

2. The Parties have reviewed the claim in depth to come to a resolution of this matter, with the terms as follows:

- a. Debtor will withdraw her Motion for Contempt.
- b. Neither party admits any wrongdoing in regard to this matter.
- c. Respondents will pay Debtor's attorney's fees in the amount of \$ 4,000.00.
- d. Nationstar Mortgage, LLC d/b/a Mr. Cooper shall issue payment to Anthony Frigo, Esq. within 14 days of receipt of this entered stipulation and a W-9 from Frigo.
- e. This Stipulation resolves all allegations of violations of the automatic stay as to Nationstar Mortgage LLC d/b/a Mr. Cooper, KML Law Group, P.C., the underlying investors on the loan, and/or any agents or parties acting on their behalf up to the date of the entry of the Stipulation.

- f. Nothing in this Stipulation shall prohibit Debtor from filing applications for sanctions for any future alleged violated violations of the automatic stay.
- g. Further, Nationstar Mortgage, LLC d/b/a Mr. Cooper is granted limited stay relief from the automatic stay to file an adversary proceeding in this bankruptcy case to determine whether the mortgage in this matter was satisfied in error and should be restored.

3. Debtor has requested that Nationstar Mortgage, LLC d/b/a Mr. Cooper is to cease sending monthly statements, and Nationstar Mortgage, LLC d/b/a Mr. Cooper is permitted to stop sending statements to Debtor that would otherwise be required by state or federal law or regulation until such time as Debtor requests that statements be sent again.

4. The parties agree that a facsimile signature shall be considered an original signature.

Date: 10/20/2021



Brian C. Nicholas, Esq.  
Attorney for Respondents

Date: 10/29/2021



Anthony A. Frigo Esq.  
Attorney for Debtor(s)

Approved by the Court this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

Bankruptcy Judge  
Eric L. Frank